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18 Attorneys for Defendant

19 HUSQVARNA CONSTRUCTION PRODUCTS

20 NORTH AMERICA, INC.

21 GARY FERRAS, an
22 individual,

23 Plaintiff,

24 v.

25 HUSQVARNA CONSTRUCTION
26 PRODUCTS NORTH AMERICA, INC.,
27 HUSQVARNA NORTH AMERICA,
28 HUSQVARNA GROUP, and
DOES 1 through 100 inclusive,

Defendants.

Fed. Ct. Case No. 4:16-CV-01081-SBA

*[Removed from Contra Costa County Superior Court, Civil
Case No. C16-00131]*

**STIPULATION AND [PROPOSED] ORDER
CONTINUING ADR DEADLINE BY
THREE WEEKS**

Complaint Filed: January 25, 2016

Trial Date: July 17, 2017

The parties, Plaintiff Gary Ferras and Defendant Husqvarna Construction Products North America, Inc., by and through their attorneys of record, hereby stipulate and request that the Court extend the deadline to complete mediation in this action by three weeks after the previous

1 deadline due to difficulties accommodating the parties' schedules. The parties are set for mediation
2 on October 19, 2016.
3

4 Pursuant to the May 31, 2016 Stipulation and Order Selecting ADR Process, the
5 parties had agreed to hold the ADR session by September 30, 2016. The parties initially agreed on a
6 mediation date within that timeframe but had to reschedule due to conflicts that arose after the
7 parties filed the Stipulation. October 19 was the first date available for all parties, including out-of-
8 state representatives, counsel, and the mediator. The parties have agreed to mediate on October 19
9 with the assistance of the mediator appointed by the Court, Kyungah (Kay) Suk. The parties
10 therefore request that the deadline to complete ADR be continued for three weeks to accommodate
11 this change. This is the first request to continue the mediation deadline.
12

DATED: September 28, 2016

FISHER & PHILLIPS LLP

14
15 By: _____ [S]
16 Jason A. Geller
17 Juan C. Araneda
18 Attorneys for Defendant
19 HUSQVARNA CONSTRUCTION
PRODUCTS NORTH AMERICA, INC.

DATED: September 28, 2016

LAW OFFICES OF ALAN F. COHEN

21 By: _____ [S]
22 ALAN F. COHEN
23 Attorney for Plaintiff
24 GARY FERRAS
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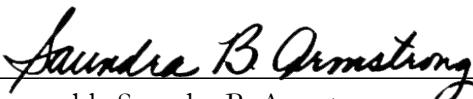
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2 **[PROPOSED] ORDER**
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4 Good cause appearing from the Parties' stipulation, the Court hereby orders that the
5 deadline for completing mediation is extended by three weeks to October 21, 2016.
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7 SO ORDERED.
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9 Date: 9/30/16
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13 Honorable Saundra B. Armstrong
14 UNITED STATES DISTRICT COURT JUDGE
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